

MODERN SLAVERY AND HUMAN TRAFFICKING STATEMENT

Introduction

This Modern Slavery and Human Trafficking Statement is a response to Section 54(1), Part 6 of the Modern Slavery Act 2015 and relates to actions and activities for the calendar year ending 31 December 2024.

PACE Networks Limited ('the Company', 'we', 'us' or 'our') is committed to preventing slavery and human trafficking violations in its own operations, its supply chain, and its products. We have zero-tolerance towards slavery and require our supply chain to comply with our values.

Organisational structure

PACE Networks Limited has business operations in the United Kingdom.

We operate in the overhead power line and railway electrification sector. The nature of our supply chains is as follows: We work with key suppliers from the UK, European Union, and further afield, who supply us with materials for the electricity overhead line transmission and distribution and railway electrification markets. We also work with a number of key direct suppliers, who provide us with other goods, such as equipment for our premises, and services, such as outsourced business processes, IT software, and marketing services.

For more information about the Company, please visit our website: <https://pace-networks.co.uk/about-us/>.

Policies

We operate a number of internal policies to ensure that we are conducting business in an ethical and transparent manner. These include the following:

Recruitment and selection policy - We conduct checks on all prospective employees to verify that they are eligible to work in the UK.

Supplier code of conduct - We operate this policy to ensure our suppliers operate in full compliance with the laws, rules and regulations of the countries in which they operate, and to seek similar commitments across their own supply chain.

Whistleblowing policy - We operate this policy so that employees are able to raise concerns about how staff are being treated or practices within our business or our supply chains without fear of reprisal.

Staff code of conduct - We are committed to the fair treatment of all staff. Our staff code of conduct reflects our core values and expected behaviours. The code of conduct makes it clear that we have a zero-tolerance approach to modern slavery.

Procurement policy - We want to make sure that potential suppliers are committed to ensuring that slavery and human trafficking is not taking place within their own supply chains. Our procurement policy and supporting procedures set out controls and checks undertaken to help verify this.

We make sure our suppliers are aware of our policies and adhere to the same standards.

PACE NETWORKS HQ

PACE NETWORKS Ltd, Nexus House, Lakeside Business Park, South Cerney, GL7 5XL, UK

Due Diligence

As part of our efforts to monitor and reduce the risk of slavery and human trafficking occurring in our supply chains, we have adopted the following due diligence procedures:

- Internal supplier audits.
- External supplier audits.
- Checking certain suppliers with external third parties for any slavery or human trafficking risks.

Our due diligence procedures aim to:

- Identify and action potential risks in our business and supply chains.
- Monitor potential risks in our business and supply chains
- Reduce the risk of slavery and human trafficking occurring in our business and supply chains. Provide protection for whistleblowers.

Risk and compliance

The Company has evaluated the nature and extent of its exposure to the risk of slavery and human trafficking occurring in its UK supply chain through:

- Evaluating the slavery and human trafficking risks of each new supplier.
- Reviewing on a regular basis all aspects of the supply chain based on supply chain mapping.

We do not consider that we operate in a high-risk environment because the majority of our supply chain is based in the UK and European Union, and regular audits of our suppliers' processes are undertaken externally and internally.

We do not tolerate slavery and human trafficking in our supply chains. Where there is evidence of failure to comply with our policies and procedures by any of our suppliers, we will require that supplier to remedy the non-compliance.

Effectiveness

The Company uses Key Performance Indicators (KPIs) to measure its effectiveness and ensure that slavery and human trafficking is not taking place in its business and supply chains. These KPIs are as follows:

We will contact suppliers to enquire about their modern slavery practices every 24 months. We will carry out a regular audit of suppliers - 50% of suppliers each year.

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The statement was approved by the board of directors.



Gavin Smith, Managing Director PACE Networks Limited

Date 04/01/2024

| Date | Summary | By | Version |
|------------|--------------------------|----|---------|
| 25/08/2022 | Approved | GS | 0.0 |
| 25/08/2023 | Reviewed and re-approved | GS | 0.1 |
| 04/01/2024 | Reviewed and re-approved | GS | 0.2 |

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